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MEMORANDUM

November 30, 2018

TO: The Commission

THROUGH: Alec Palmer *AP*
Staff Director

FROM: Kate Higginbotham *KAH*
Acting Deputy Staff Director
Management & Administration

SUBJECT: Updated Corrective Action Plan for Telework Program Audit

Attached please find the Corrective Action Plan (CAP) for the above audit. We anticipate completing the items currently in the testing and development phase during calendar year 2019. These actions were delayed due to HR staffing gaps and the FEC's relocation.

The day-to-day oversight and management of the Telework Program has been transitioned to Hope Hanner-Bailey. In addition, OHR is creating an annual standard review of the Telework program's data and policies that will coincide with OPM's annual telework data request. Earlier this month, we reached out to the OIG to discuss the open recommendations and confirm management's planned actions will close out the remaining items in the near future.

Please feel free to contact me if you have any questions.

Thank you.

Corrective Action Plan - Updated November 2018

Follow-up Official: Kate Higginbotham, Acting Deputy Staff Director for Management & Administration

No.	Recommendation	Management Response	Current Status	Status	OIG Comment
1	Managers should ensure that episodic telework is only used for its intended purpose, which is defined in the OPM Federal telework guidance and the FEC telework policies as "sporadic, or for a short period of time."	Both the Bargaining Unit and Non-Bargaining Unit Telework policy intended purpose, which is defined in the OPM Federal telework guidance defines episodic telework and that it should not coincide with and the FEC telework: policies as "sporadic, or for a short period of time." regularly scheduled telework to expand the limits of regular telework. Telework training stresses this point as well. Non- compliance is part of the annual program review guidance to be developed.	This is included in staff email. The control review process will include reviewing telework applications for employees in the telework program.	On-going. Control review creation and initial implementation expected by 6/30/19.	
2	The TMO or designee should periodically monitor telework activity to ensure episodic telework is being used properly, and to identify excessive use of episodic telework. The OIG suggests that WebTA telework reports could be generated to assist in this process.	Concur with recommendation. Will be incorporated in annual program review procedures to be developed. WebTA reports to be developed.	The designee will review use of episodic telework as a part of the control review process.	On-going. Control review creation and initial implementation expected by 6/30/19.	
3	FEC telework policies should state whether employees can request and/or be granted special telework arrangements (any arrangement outside the normal policy), as well as list the criteria that will be used for determining whether or not an employee can be approved for a special telework arrangement. If special telework arrangements are to be allowed, even if on a temporary basis, they should be documented in writing separate from the standard telework application and should include the anticipated timeframe of the special arrangement. Consideration should be given to have all special telework arrangements approved by the Staff Director, General Counsel, or Chief Financial Officer, as appropriate, along with notification to the TMO.	Special telework requests are handled through the FEC's Reasonable Accommodation Process through the EEO office, with documented evidence that special circumstances exist. Temporary applications for special telework requests are handled in the same manner as normal requests.	While the EEO office continues to handle special telework requests as a part of the Reasonable Accommodation process, OHR will review the NBU policy to consider adding information about special telework arrangements during the control review.	On-going	
4	The TMO or designee should perform monitoring of the telework programs at least annually. The WebTA telework activity reports could be generated and reviewed to perform monitoring and evaluation of the telework programs. Currently these reports are general to respond to occasional OPM telework data calls. For example, some of the reports list the names of the employees who telework more days than the policies allow and break it down by the actual number of days teleworked. A sample of employees who appear to telework more days than are allowed per policy could be followed up on to determine if the data is accurate, proper documentation exists, explanations are reasonable, and/or telework activity is not in compliance with applicable policies.	Concur with recommendation. Will be incorporated in annual program review procedures to be developed. WebTA reports to be developed.	Once the control review for telework is created, OHR will conduct the initial control review, and then will repeat the control review annually, coinciding with OPM's annual telework data call.	On-going. Control review creation and initial implementation expected by 6/30/19.	

5	The TMO or designee should implement tools and processes to evaluate the effectiveness of the FEC's telework programs.	Concur with recommendation. Will be incorporated in annual program review procedures to be developed. WebTA reports to be developed.	Once the control review for telework is created, OHR will work with OCIO to create any necessary reports. Until then, OHR will work with OCIO to pull data from WebTA for the purpose of monitoring the telework program.	On-going. Control review creation and initial implementation expected by 6/30/19.	
6	The TMO should reinforce the importance of ensuring telework hours are accurately recorded in WebTA before validating time sheets.	Concur with recommendation. New time accounting categories to reflect accurate WebTA documentation have been incorporated in WebTA.	Closed	Complete	
7	Supervisors and managers should ensure telework hours are accurately recorded in WebTA before certifying time sheets.	Concur with recommendation. New time accounting categories to reflect accurate WebTA documentation have been incorporated in WebTA.	Closed	Complete	
8	Management should ensure telework policies and training materials give clear explanations as to when each type of telework pay category should be used. Also, the TMO should hold refresher training.	WebTA and telework training will be updated to reflect additional WebTA categories.	OHR will add information about properly recording telework hours to the staff email and will request that it is added to OCIO WebTA training.	On-going	
9	The TMO or designee should reinforce telework policies and procedures to supervisors and staff annually (and as needed based on results of monitored activity).	Concur with recommendation. TMO to send periodic reminder emails to all staff concerning Telework procedures.	The designee continues to send annual reminder emails to all staff concerning telework procedures. OHR will add information about properly recording telework hours to the staff email and will request that it is added to OCIO WebTA training.	On-going	

10	The TMO or designee should implement a control procedure to ensure all employees that are participating in the telework program have an approved telework application on file.	Concur with recommendation. Will be incorporated in annual program review procedures to be developed. WebTA reports to be developed.	The designee is creating a control review process for the telework program that will coincide with OPM's annual telework datacall. The control review will include reviewing telework applications for employees in the telework program. Once created, OHR will conduct an initial control review and then will repeat the control review annually.	On-going. Control review creation and initial implementation expected by 6/30/19.	
11	The TMO or designee should periodically (at least annually) assess the telework programs and determine if policies and procedures need to be updated to reflect changes in standard practices and/or update for other reasons.	Concur with recommendation. Will be incorporated in annual program review procedures to be developed. WebTA reports to be developed.	OHR reviews telework policies and procedures before sending open season emails to staff. The designee will also review policies and procedures for alignment with the law as a part of the annual control review process.	On-going. Control review creation and initial implementation expected by 6/30/19.	